SECTION 2. REPORTING ON SURVEILLANCE

25. INTRODUCTION. The Program Tracking and Reporting Subsystem (PTRS) is a comprehensive information managements and analysis system used in many flight standards job functions. It provides the means for the collection, storage, retrieval, and analysis of data resulting from the many different job functions performed by inspectors in the field, the regions, and headquarters. PTRS is comprised of four components, each of which is described in detail in this section. This system provides inspectors and managers with current data on airmen, air agencies, air operators, and many other facets of the air transportation system. The various retrieval and reporting features of this system permit managers, supervisors, and principal operations inspectors to effectivley plan work programs, prioritize activities and specific job tasks, and to analyze the safety and compliance status of various elements throughout the air transportation industry. This section provides the background and developmental considerations that resulted in the PTRS, discussions and illustrations of the various components of the system, and instruction and guidance of the use of the system.

27. BACKGROUND.

A. Investigations and evaluations of FAA operational procedures by Congress and other government agencies, as well as internal audits conducted by the FAA, have shown that the FAA collects a vast amount of aviation data to support its responsibility for ensuring aviation safety. These studies contain many factors the FAA must consider to obtain optimal compliance with the FAR's and safe operating practices. One of the most important factors is a well-planned and implemented surveillance program carried out by a trained and experienced FAA inspector workforce. These studies revealed, however, that an FAA program didnot exist for a consistent and efficient organization and collection of data or for the timely identification and monitoring of trends involving safety in the air transportation industry.

B. Recognizing the need for a modern method to manage aviation data, the FAA established the Aviation Safety Analysis System (ASAS) in August 1982. ASAS is a nationally-distributed information network designed to collect, store, and organize the many types of aviation safety data in a single system. ASAS consists of several separate subsystems designed to improve the FAA's abilityto gather and analyze aviation safety data within all aviation standars offices. The primary objectives of ASAS are: to provide data support for identifying potential and existing safety issues; to supply management with information for a more effective use of FAA resources; to provide the FAA with the ability to respond internal and external requests for information; and, to provide timely and accurate information that is accessible to all appropriate system users. ASAS integrates and standardizes current and future databases and maintains these databases on central host commputers. These host commputers are presently linked by a telecommunications network to work stations located at all aviations standards facilities.

C. In the early stages of development, however, ASAS did not address the FAA's needs to categorize and effectively analyze surveillance data in a logical and meaningful manner. An integral part of the evolving ASAS was the Flight Standards Work Program Management System (WPMS). WPMS provided a standard method for planning Flight Standards' work functions and for recording the accomplishment of inspector activities. Additionally, it provided rapid access to a large volume of data and could generate reports for district offices, regions, and headquarters. The major objectives of WPMS were as follows: to relieve inspectors of certain paperwork and administrative activities; to standardize and automate the methods for programming and recording work activities; and, to provide an automated capability for retrieving data. WPMS increased the efficiency of scheduling and tracking flight standards work functions. Flight Standards' use of the WPMS demonstrated that it was a viable method for taking advantage of computerized automation capabilities in work activity performance. It became apparent to many users however, that there were ways in which WPMS could be improved to make it more useful to field inspectors and to all levels of FAA management. The computer system could be used in a manner which would allow inspectors to quickly identify trends and deficiencies that could affect aviation safety. For work activity management to be effecient, the system should not only program and record the types of work activity performed, but also identify areas

where work priorities should be changed or areas where increased or different types of activity should be accomplished. WPMS provided information on what type of and how many inspections of a certain type were performed, but didnot lend itself to summary or ad hoc reporting of the actual inspection results or comments recorded by inspectors. As a result, the Uniform Task Reporting (UTR) system was developed between 1987 and 1988 in an attempt to resolve these deficiencies. The UTR system provided inspectors with the data processing tools they needed to best accomplish their job function responsibilities.

D. The UTR system included not only the existing WPMS functions, but also a method for readily identifying deficiencies and trends (both negative and positive). The concept included a single reporting form to collect information about many types of inspector work activities. It contained a method for specifically coding the inspector's comments or remarks about the inspection, evaluation, or observation. The codification of inspector comments took advantage of computer capability to generate more defined summary and ad hoc reporting. This codification made possible a variety of information strategies. After extensive field testing of the UTR system, the WPMS and UTR systems were updated and combined into one system currently known as PTRS.

29. OBJECTIVES OF PTRS. The broad objective of PTRS (Program Tracking Reporting Subsystem) is to provide inspectors with an information processing and management system which is comprehensive in scope, provides current data in a manageable format, and offers effective data retrieval and reporting capabilities. In addition to the original were also added to the PTRS:

- To provide a systematic and organized method for inputing data through the use of job aids and standardized codes
- To provide a method for the structured retrieval of stored data in a variety of automated formats (standard reports or with total ad hoc flexibility)
- To have the capability for storing data in a manner which permits effective trend analysis (both positive and negative trends) as well as the identification of specific deficiencies
- To the multiple and nonstandard paper inspection forms with one generic form compatible with computer input requirements
- To permit employment of certain data analysis strategies to determine if specific inspection activities or other job functions warrant either increased or decreased work activity

31. THE COMPONENTS OF PTRS. The four components of PTRS are as follows:

- PTRS Data Sheet
- PTRS comment codes (These are alpha/numeric codes derived from nine "primary area" alpha codes and "key word list" numeric codes.)
- Job aids
- Standard and ad hoc reports

A. *PTRS Data Sheet.* The PTRS Data Sheet is a single form designed to be used for all inspector work functions (see figure 6.1.2.1). This form has spaces for manually recording information that describes the type of job function performed and the results of that activity, including any inspector opinions, comments, and remarks. Once the information from the PTRS Data Sheet is entered into the computer and the computer data is backed-up, the form may be destroyed. Inspectors may enter the information required by the PTRS form directly into the computer without actually completing the form, provided apprpriate computer work stations are available. A full description of the form and detailed instructions for its completion are in the FAA, PTRS User Manual. This form is divided into the following sections:

(1) *Section 1 (PTRS Activity Section).* This section has spaces for recording information that describes the type of job function performed, the overall results of the activity, data pertinent to the subject of the activity, and other information required for PTRS input.

(2) *Section 2 (Personnel Section).* This section provides space to record information about personnel that was acquired during the accomplishment of the job function. This personnel information is for persons other than those recorded in section 1. For example, it includes personnel such as SIC's, FE's, flight attendants, supervisors, foreman. fuelers, and any other personnel the inspector wants to include in the record. The inspector may enter in Section 2 any remarks which are significant to the job function such as telephone numbers, duty time,

or qualification status. The inspector should not duplicate any information in this section which was already recorde in section 1.

(3) *Section3 (Equipment Section).* This section provides space to record information on specific items of equipment, components, or appliances. An inspector can identify a particular item (by manufacturer, model, and serial number) which was inspected (such as engines in an overhaul facility). The inspector should not duplicate any information in this section which was already recorded in section 1.

(4) *Section 4 (Comment Section).* This section is divided into the following subsections: “primary area,” “key word list,” “opinion,” and “comment.” It provides the inspector with the ability to classify specific areas of interest and elements of information in a codified (alpha/numeric) format. These codes are reffered to as PTRS comment codes. Section 4 also provides space to enter an opinion code (U, P, I, E) that expresses the inspector’s personnel assessment of the item, practice, or procedure that was evaluated or observed. The last part of this section provides space for the inspector to record narrative comments about the item, practice, or procedure that was evaluated or observed.

FIGURE 6.1.2.1
THE PTRS DATA SHEET

PROGRAM TRACKING AND REPORTING SUBSYSTEM DATA SHEET

SECTION I

Inspector Name Code: ______ Record ID: ______

Activity Number:	FAR:	NPG:
Status: (COP)	Callup Date:	Start Date:
Results: (ACEFISTX)	Pass/Fail (P/F):	Completion Date:
Designator:	Airman Cert #:	
Airman Name/Other:		
Aircraft Reg #: N		
Make-Model-Series: ______ - ______ - ______		
Loc/Departure Point:	Arrival Point:	Flight #:
Investigation # (12):		

Tracking:

Miscellaneous:

Numeric Misc:

Local Use:

Regional Use:

National Use:

Activity Time

Travel Time:

Triggers: (Activity #/ INVS/ REXM/ R # (repeat))

SECTION II — PERSONNEL (unlimited)

Personnel Name:	Position:	Base:	Remarks (35 Characters)

SECTION III — EQUIPMENT (unlimited)

Manufacturer	Model:	Serial #:	Remarks (23 Characters)

SECTION IV — COMMENT SECTION (unlimited)

COMMENT Primary/Key	CODES Opinion (UPIE)	Comment Text (unlimited length)

Date: Originator: Office:

Inspector Signature: Supervisor Initials

FAA Form 8000-36 (10-89)

B. *PTRS Comment Codes.* The PTRS comment codes are the second component of the PTRS. These alpha/numeric codes categorize nine specific "primary areas" (the alpha element of the code), which can be associated elements of information from the "key word list" (the numeric element of the code). For example, one of the nine "primary areas" is "air carrier operations" (codified by the alpha character, "A"). An associated element of information from the "key word list" is "training program" (designated by numeric characters, "401"). Therefore, an inspector can codify comments about an air carrier training program inspection by entering the code, "A401" (air carrier operations/training program) in section 4 of the PTRS form. The comment code precedes the inspector's narrative comment about the specific evaluation or observation. A complete list of the PTRS comment codes is in the PTRS Comment Code Master List (see figure 6.1.2.2). A thorough discussion of the use and application of PTRS comment codes is in paragraphs 33 and 35 of this section. This method of data collection, organization, and data input provides for exceptional information analysis and reporting capabilities.

NOTE: It must be clearly understood that PTRS comment codes are not related to or derived from the PTRS activity codes. The PTRS activity codes (formerly WPMS activity codes) are used to classify the type of job function conducted; for example "1624" is the activity code for an en route inspection. The PTRS comment codes, however, are used to classify comments about particular items observed or evaluated during a work activity and are made distinct by an alpha/numeric codification.

FIGURE 6.1.2.2
THE PTRS COMMENT CODE MASTER LIST

PRIMARY AREAS

A Air Carrier Operations
B General Aviation Operations
C ATC/Air Space
D Airports
E Air Agencies
F Air Carrier Airworthiness
G General Aviation Airworthiness
H Aircraft
J Crewmembers

KEY WORD LISTINGS

100 Personnel

101 Knowledge
103 Ability/Proficiency
105 Qualifications/Currency
107 Staffing
109 Certificates/Ratings
111 Briefings
113 Rosters
199 Other/Remarks

200 Manuals

201 Content/Information
203 Currency
205 Revision/System
207 Distribution
209 Availability
299 Other/Remarks

300 Records/Reports

301 Disposition/Retention
303 Procedures
305 Personnel
307 Content/Information
309 Currency
311 Availability
313 A/C Discrepancies
315 Inspections
317 Major Repairs/Alterations
319 Return To Service
399 Other/Remarks

400 Training

401 Program
403 Curriculum
405 Aids/Devices
407 Testing
409 Records
411 Facility
413 Instructors
499 Other/Remarks

500 Facilities/ Equipment/Surface

501 Adequacy
503 Environmental
505 Lighting
507 Snow & Ice Control
509 Runways
511 Taxiways
513 Sterile Area
515 Ramp/Gate Area
517 Vehicles/Other Equipment
519 Obstruction
521 Construction
523 Contamination/F.O.D.
525 Markings
527 Signs
529 Approach Aids
531 Navigational Aids
599 Other/Remarks

600 Conformance

601 Crew Complement
603 Procedures
605 Checklist
607 MEL/CDL
609 Approved Program
611 Airworthiness Directives
613 Weight and Balance
615 Analysis and Surveillance
617 Regulations
619 Security
621 Operations Specifications
623 Sterile Cockpit
625 A/C Limitations
627 Carry on Bags
629 Cabin Safety
631 Company Directives
633 ATC Clearances
635 Public Safety
637 Passenger Handling
639 Flight & Duty Time
641 Hazardous Material
643 Waivers/Authorizations
699 Other/Remarks

700 Operations

701 ATC/Clearance
703 ATIS
705 SAWRS/AWOS
707 SID's/STARS
709 SIAP's
711 Procedures
719 Other/Remarks

FLIGHT CONDUCT

721 Preflight
723 Predeparture
725 Taxi/Takeoff
727 Climb
729 Cruise
731 Descent
733 Approach
735 Landing/Taxi
737 Crew Coordination
739 Vigilance
741 Flight Navigation
743 Marshalling
749 Other/Remarks

FLIGHT CONTROL

751 Inflight Comm
753 Ground Comm
755 Land Based Comm
757 Weather
759 Flight Information
761 Flight Tracking
763 Flight Planning
765 Dispatch/Flight Release
767 A/C Loading
779 Other/Remarks

KEYPERSONNELPROGRAMS

781 Check Airmen
783 Designees
785 Dispatchers/Flight Followers
799 Other/Remarks

800 Maintenance

801 Procedures/Methods/Systems
802 Inspection Systems
803 Programs
804 Logbooks
805 Carryovers
806 Agency Certificate/Ratings
807 Taxi/Towing
808 Fueling
809 Required Placards
810 Servicing
811 Standard Practices
812 Deicing
813 Scheduled
814 Unscheduled
815 Parts/Material
816 Equipment/Tools
819 Other/Remarks

AIRCRAFT ATA CODES

821 Air Conditioning
822 Auto Flight
823 Communications
824 Electrical Power
825 Equipment/Furnishing
826 Fire Protection
827 Flight Controls
828 Fuel
829 Hydraulic Power
830 Ice/Rain Protection
831 Ind/Recording Sys
832 Landing Gear
833 Lights
834 Navigation
835 Oxygen
836 Pneumatic
837 Vacuum/Pressure
838 Water/Waste
839 EE Panels/Component
849 APU
851 Structures
852 Doors
853 Fuselage
854 Nacelles/Pylons
855 Stabilizers
856 Windows
857 Wings
861 Propellers
865 Rotors
871 Power Package
872 Engine
873 Engine Fuel
874 Ignition
875 Bleed Air
876 Engine Controls
877 Engine Indicating
878 Engine Exhaust
879 Engine Oil
880 Starting
881 Turbine (Recip)
882 Water Inj.
883 Gear Box

KEYPERSONNELPROGRAMS

890 Designees
891 Inspection Authorization (I.A.)
892 Repairmen
899 Other/Remarks

900 Management

901 Organizational Structure
903 Communications
905 Effectiveness
907 Coordination
909 Authority
911 Info Dissemination
913 Qualifications
919 Other/Remarks

950 Administration

951 UTR Forms
953 Key Word Listing
955 Job Aids
957 Instructions
959 Handbook Material
961 Other Directives
963 Inspector Training
965 FAA Forms
967 Advisory Circulars
999 Other/Remarks

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C. *Job Aids.* The third component of PTRS consists of those job aids specifically designed for various inspector job functions and activities. Jod aids provide general guidance on what types of practices, procedures, or items should be evaluated during an inspection or other job function. When applicable, job aids include the specific PTRS code (from the PTRS Comment Code Master List) the inspector can use when completing the PTRS Data Sheet (formal report of the inspection).

D. *Standard and Ad Hoc Reports.* The fourth component of PTRS consists of the various types of reports that the system is capable of generating. There are several options available to the inspector when selecting the type and scope of information desired from the database. This flexibility permits generation of reports in a standard format or in a completely ad hoc format.

33. USING THE PTRS COMMENT CODES. When completing the PTRS Data Sheet, it is extremely important that inspectors use the PTRS comment codes properly. To establish a credible and useable database, it is essential that inspector comments be consistently and accurately coded. Inspectors must carefully select the appropriate comment code for each comment recorded on the PTRS Data Sheet. The codes are derived in the following two-step process:

A. The first step is to identify the pertinent "primary area." There are nine primary areas, each designated by a capital letter, A through J. This is the aplpha character of the comment code in section 4 on the PTRS Data Sheet. Primary areas are used to categorize the comments or remarks from an inspection or other job function as follows:

PRIMARY AREA	PRIMARY AREA CODES
• Air Carrier Operations	A
• General Aviation Operations	B
• ATC/Airspace	C
• Airports	D
• Air Agencies	E
• Air Carrier Airworthiness	F
• General Aviation Airworthiness	G
• Aircraft	H
• Crewmembers	J

NOTE: The letter "I" is not included as a primary area alpha character because it can be confused with the numeric character "1".

comment code is to select the appropriate element of information from the key word list (see figure 6.1.2.2., PTRS Comment Code Master List). The key word list permits a more detailed breakdown of the primary areas into various elements of information. For example, "manuals" (200) in the key word list is broken down as follows:

200 - MANUALS
201 - Content/Information
203 - Currency
205 - Revision/System
207 - Distribution
209 - Availability
299 - Other/Remarks

NOTE: In this example "manuals (200)" is a header for a category of key words. The number 200 cannot be used to clarify a comment or to be as part of a comment code.

C. Numeric-coded elements of information from the key word list are combined with alpha codes for the applicable primary area to properly identify the specific item the inspector is commenting upon. For example, if the comment concerns the content of an air carrier operations manual, the PTRS comment code that should be entered on the PTRS Data Sheet is "A201." If the comment concerns the distribution of the air carrier operations manual, the code should be "A207." A comment concerning information in an airport operations manual should be coded "D201." If the comment is about the distribution of an airport operations manual, the code should be "D207."

35. SELECTION OF APPROPRIATE PRIMARY AREA AND KEY WORD LIST CODES. It is essential that inspectors select the appropriate primary area and combine it with the appropriate key word list code to maintain an accurate and useful database. If appropriate selections are made, the database can be effectively used to identify deficiencies and trends and to provide other types of analysis functions for the user. To assist the inspectors in selecting the proper codes, the Job Aid Disk (JAD) contains several different types of job aids for various types of inspector activities. The job aids for inspections contain lists of items which serve as "reminders" and also provide guidance on the specific areas that should be observed or evaluated during a particular type of inspection. In most cases, the list of items in a job aid includes the specific PTRS comment code that should be used when completing the PTRS Data Sheet. The following descriptions of primary areas include examples of how elements of

information from the key word list are combined to generate appropriate PTRS comment codes:

A. Air Carrier Operations - "A." The primary area "air carrier operations" is used to code comments pertaining to the operational areas (as opposed to the airworthiness areas) of air carrier activities conducted under Parts 121 and 135 (including activities of an applicant for a certificate to conduct those types of pertaining to the operational areas of Part 129 operators. This primary area must not be used for Part 125 operations. This code is generally used by operations inspectors, however, airworthiness inspectors should use the "A" primary area code if their comment relates to an operational matter. The following example illustrates the use of the "A" primary area code. An inspector performs a line/station facility inspection (PTRS activity code 1617) on a Part 135 commuter operator. During the inspection, the inspector determines that the operator's manual (which is maintained by the line/station facility) does contain the last two revisions. The primary area code to be used in such a case would be "A" (air carrier operations) and the key word element used would be "203" (manuals, currency). The resulting PTRS comment code for this type of comment would be "A203".

B. General Aviation Operations - "B." The primary area "general aviation operations" is used to code comments pertaining to operational areas, methods, or procedures that are associated with general aviation (operations other than air carrier operations). The "B" primary area code encompasses, but is not limited to, comments about operations conducted under Parts 91, 101, 103, 105, 125, 133, and 137. This primary area code relates to operational aspects that are generally considered to be in the area of general aviation. The following example illustrates the use of the "B" primary area code. An inspector monitors an reshow (PTRS activity code 1686) and observes one of the acrobatic performers executing a maneuver contrary to the provisions of the airshow waiver. The primary area code to be used in such a case would be "B" (general aviation operations) and the key word element used would be "642" (conformance, waivers/authorizations). The resulting PTRS comment code for this type of comment would be "B643."

C. ATC/Airspace - "C." The primary area "ATC/airspace" is used to code comments pertaining to such items as towers, TRACON's, FSS's, Air Route Traffic Control Centers, and any related air traffic of airspace procedures, activities, or facilities. The following example illustrates the use of the "C" primary area code. An inspector conducts a cockpit en route inspection (PTRS activity code 1624) and observes that the "ATIS information for a specific airport was broadcast so rapidly that the crewmember had to listen repeatedly for understanding. The primary area code to be used in such a case would be "C" (ATC/airspace) and the key word element would be "703" (ATIS). The resulting PTRS comment code for this type of comment would be "C703."

NOTE: Inspectors are not specifically assigned to conduct work activities or inspections in connection with ATC/airspace facilities. Inspectors are, however, encouraged to comment on their observations of these facilities and related ATC/airspace procedures or activities.

D. Airports -"D." The primary area "airports" is used to code comments pertaining to such items as runways, taxiways, ramp areas, crash/fire/rescue equipment, snow removal. security procedures, and construction areas. Comments concerning airports may result from various types of work activities such as ramp inspections or en route inspections. The following example illustrates the use of the "D" primary area code. An inspector conducts a ramp inspection (PTRS activity code 1622) and observes large cracks and holes in an adjacent taxiway. The primary area code to be used in this case would be "D" (airports) and the key word element used would be "511" (taxiway). The resulting PTRS comment code for this type of comment would be "D511."

E. Air Agencies - "E." The primary area "air agencies" is used to code comments pertaining to various aspects of air agencies such as pilot schools (Part 141), repair stations (Part 145), aviation maintenance technician schools (Part 147), and parachute lofts (Part 149). Many air carriers have air agency certificates in addition to operating certificates. For example, some air carriers are certificated to conduct training under Part 141 (pilot schools) and accordingly administer instruction in the same aircraft simulators used in their Part 121 or Part 135 approved training programs. The regulatory requirements of Part 141, however, must still be met for the operator to retain the air agency (pilot school) certificate. In such cases, the "E" primary area code should be used when a comment relates to the air agency (Part 141). The following example illustrates the use of the "E" primary area code. The recordkeeping requirements of FAR 141.101 is an inspection area that should be evaluated during an air agency facility inspection (PTRS activity code 1640). During such an inspection, the inspector determines that student records are not maintained for 1 year after

graduation. The primary area code to be used in this case would be “E” (air agencies) and the key word element to be used would be “301”(records disposition/retention). The resulting PTRS comment code for this type of comment would be “E301.”

F. Air Carrier Airworthiness - “F." The primary area “air carrier airworthiness” is used to code comments pertaining to the airworthiness areas (as opposed to the operational areas) of air carrier activities conducted under Parts 121 and 135 (including activities of an applicant for a certificate to conduct those types of operations). “F” is also used for coding comments pertaining to the airworthiness areas for Part 129 operators. Tis primary area must not be used for airworthiness areas relating to Part 125 operations. The primary area code is generaly used by airworthiness inspectors, however, operations inspectors should use the “F” primary area code if their comment relates to an airworthiness matter. The following example illustrates the use of the “F” primary area code. An inspector conducts a spot inspection (PTRS activity code 3628) and determines that the operator’s mechanics are using an inappropriate procedure for repairing an aircraft. The primary area code to be used in this case would be “F” (air carrier airworthiness) and the key word element used would be “801” (maintenance, procedures/methods/systems). The resulting PTRS comment code for this type of comment would be “F801.”

G. General Aviation Airworthiness - “G." The primary area “general aviation airworthiness” is used to code comments pertaining to the airworthiness requirements, programs, procedures, and functions of general aviation airworthiness activities. The “G” primary area code encompasses, but is not limited to, comments about activities involving general aviation airworthiness areas conducted under Parts 91, 101, 103, 105, 125, 133, and 137. The following example illustrates the use of the “G” primary area comment code. An inspector conducts a ramp inspection (PTRS activity code 3681) and, while examining the aircraft’s logbook, determines that work was accomplished on the aircraft by someone who was improperly certificated to perform that specific activity. The primary area code to be used in this case would be “G” (general aviation airworthiness) and the key word element used would be “109” (personnel certificates/ratings). The resulting PTRS comment code for this type of comment would be “G109.” In this example, since the comment concerned the person actually performing the work, the key word element under “personnel” was used.

H. Aircraft - “H." The primary area “aircraft” is used to code comments pertaining to such items as aircraft condition, aircraft servicing, and scheduled or unscheduled aircraft maintenance. The elements of information used within this primary area should usually align with the ATA aircraft codes. This primary area is used to code comments about the condition of an aircraft and its systems during any type of work activity conducted by both operations and airworthiness inspectors. The following example illustrates the use of the “H” primary area code. An inspector conducts a ramp inspection (PTRS activity code 1622) on a Part 135 operator’s aircraft and discovers that the cargo-loading door has several dents and a cracked hinge. The primary area code to be used in this case would be “H” (aircraft) and the key word element used would be “852” (aircraft ATA codes, doors). The resulting PTRS comment code for this type of comment would be “H852.”

I. Crewmembers - “J." The primary area “crewmembers” is used to code comments pertaining to the evaluation, inspection, or observation of anyone authorized to perform duties in an aircraft during flight. This includes all pilots, flight engineers, flight attendants, and navigators, regardless of whether they were performing inflight duties at the time of the observation. This primary area also encompasses such items as crewmember proficiency, records, and manuals. Check airman and examiners are considered crewmembers since they are in the broad category of “...any person authorized to perform duties in an aircraft during flight.” The following example illustrates the use of the “J” primary code. An inspector conducts an en route inspection (PTRS activity code 1624) and observes that, during the area departure (while below 10,000 feet MSL) the PIC exceeded 250 knots. The primary area code to be used in this case would be “J” (crewmembers) and the key word element used would be “727” (climb). The resulting PTRS comment code for this type of comment would be “J727.”

37. DETERMINING THE ACTUAL ISSUE OF A COMMENT. Before recording a comment, inspectors should determine the actual issue they want to convey. It is helpful before writing the comment to ask the question, “What is the actual issue or what is the information that should be conveyed by the comment?” Usually it is better to write the comment before selecting the PTRS comment code. Sometimes, however, selecting a comment code before writing the comment may help to identify the actual issue and make it easier to write a clear, concise comment. When selecting an appropriate PTRS comment code, inspectors must be careful to select a code which focuses on the actual issue or information intended to be conveyed by the narrative comment. The following example of an

inspector's narrative comment is used to illustrate the selection of an appropriate comment code and why the selection of other codes would be inappropriate.

SECTION IV — COMMENTS (unlimited)

PTRS CODES		
Primary/ Key	Opin. UPIE	Comments (unlimited length)
A711	U	PIC INITIATED BEFORE LDNG CHECKLIST AT 700' AGL ON CLT RWY 36L ILS. EXISTING WX 300' AND 2 SM. THE APPROVED PROCEDURE IN FLIGAT MANUAL PERMITS LOWERING OF LDNG GEAR ON ILS AS LOW AS 500'. THIS IS CONTRARY TO STABLIZED APPROACH CONCEPT. PIC MAINTAINED GOOD FLT PATH CONTROL BUT BEFORE LDNG CHECKLIST NOT COMPLETED UNTIL 200' AGL. THE PROCEDURE SHOULD BE CHANGED TO BE CONSISTENT WITH STABLIZED APPROACH CONCEPT FOR PRECISION APPROACHES.

Appropriate Comment Code. In this example, it is the inspector's opinion that there is a fundamental problem with the approved procedure described in the company's flight manual. This inspector believes the procedure is deficient and inconsistent with safe operating practices. Although the PIC may not have used good judgement in delaying the lowering of the landing gear, the inspector correctly identified the actual issue to be a deficiency in an approved procedure. In this case, the inspector correctly selected an appropriate PTRS comment code of A711 (air carrier operations/procedures, see figure 6.1.2.2) and recorded his opinion that the procedure is unacceptable.

Inappropriate Comment Code. In the above example the inspector could have selected a PTRS comment code of J733 (crewmember/approach). This code, coupled with the inspector's opinion that it was unacceptable ("U"), would convey that the PIC made an unacceptable approach. The PIC, however, conducted the approach in accordance with an approved procedure and was previously trained and checked in the use of that procedure. The selection of a comment code of J733 would be incorrect because it does not identify the actual issue.

Inappropriate Comment Code. Another inappropriate comment code that could be selected for this example would be J603 (crewmember/conformance with a procedure). The element of information code "603" is procedures. However, it is listed under the title of "conformance" and when coupled with an inspector opinion of unacceptable (U) or potential (P) is intended to convey nonconformance with a procedure. In this example the crewmember conformed to an approved procedure, therefore, the "J" (for crewmember) and "603" (for conformance with a procedure) does not convey the actual issue which concerns a faulty procedure used by the operator.

39. INSPECTOR OPINION CODES ("U","P","I", "E"). Section 1 of the PTRS Data Sheet has a space for the inspector to record the results or work status of a work activity (including inspections) by circling the appropriate code (A, E, F, I, S, T, X). These results or status codes must not be confused with the inspector opinion codes (U, P, I, E) which are recorded in section 4 on the PTRS Data Sheet. The inspector opinion codes in section 4 are designed to provide inspectors with more flexibility to express their opinions about evaluations or observations. The inspector opinion codes relate only to a particular narrative comment recorded in section 4. Each comment recorded in section 4 should be accompanied with an inspector opinion code. Section 4 provides a space for inspectors to record their opinions in the form of codes "U", "P", "I", "E." It is often difficult to classify an observation or evaluation as simply "satisfactory" or "unsatisfactory." Opinion codes provide inspectors with the latitude to express an opinion that an evaluation or observation indicates a potential problem or that the recorded comment is simply informational in nature. Inspectors should use the opinion codes to express an opinion that a particular person, item, or an area exceeds recognized standards. The opinion codes permit inspectors to record information and express their opinions with more detail about their observations or evaluations.

A. *Unacceptable.* "U" (unacceptable) means that, in the inspector's opinion, a person, item, or subject area was not in compliance with either regulations or safe operating practices, or was either inadequate or unsatisfactory. The recording of an "unacceptable" inspector opinion code in section 4 on the PTRS Data Sheet does not directly relate to the results code recorded in section 1. Often an inspector may need to express an opinion that a person, item, or subject area observed or evaluated during a work activity or inspection was unacceptable, but still may find that the overall results of the particular work activity was satisfactory "S." The example given in paragraph 37 illustrates a situation in which the inspector opinion code for a particular comment could be unacceptable but the overall results of the work activity (the inspection) could be satisfactory. This type of situation is entirely acceptable in that the inspector opinion codes in section 4 are used to classify the comments recorded by the inspector for the purpose of information processing and analysis. In addition, a particular item or subject area may be satisfactory under current standards, however, in the inspector's opinion, that item or subject area may still be unacceptable. If a sufficient number of unacceptable opinions are recorded, justification can be established to support a revision to the standards. If an inspector is able to correct a situation or deficiency during the work activity which was unacceptable, the inspector should still record an "unacceptable" opinion code. The "unacceptable'" opinion code provides information for future analysis and trend identification. In this case, however, the inspector's comment should include that corrective action was taken.

B. *Potential.* "P" (potential) means that, in the inspector's opinion, there was a potential for a person, item, or subject area to be in noncompliance with either the regulations or safe operating practices, or to be either inadequate or unsatisfactory. The "potential" opinion code indicates the possibility that a problem exists or may exist. This code is useful for the identification of trends that could lead to more serious problems. The code also provides inspectors with a way to classify comments traditionally known as "grey areas." Inspectors should use this opinion code when they become aware of situations or procedures which are technically in compliance with regulations but which from a practical viewpoint are poorly planned and/or executed, and therefore could have caused noncompliance with a regulation or safe operating practice. In these situations the "potential" opinion code along with an appropriate narrative comment can be used to indicate that noncompliance could have occurred, had the inspector not intervened. For example, an inspector had to remind a crewmember to fasten the shoulder harness before takeoff. Without this reminder the potential for noncompliance with a regulation existed. Crewmembers and other company personnel, in the presence of an FAA inspector, sometimes react or perform differently than they would during routine operations when an inspector is not present. This different reaction or performance becomes quite apparent to inspectors for various reasons. In such a case, the "potential" opinion code can be used to indicate that (in the opinion of the inspector) crewmembers or other personnel may be using different standards when an inspector is not present. Another example of the definition of "potential" opinion code can be found in the distinction between "potential" opinion code and "unacceptable" opinion code. The "unacceptable" opinion code would be used when an inspector wants to convey the belief that an actual problem exists. The "potential" opinion code, however, would be used to classify a comment when an inspector wants to convey the belief that a potential problem exists or that a situation could develop into a problem if remedial action is not taken. The "potential" opinion code for a particular comment does not directly relate to the overall results of the work activity (or inspection) recorded in section 1 on PTRS Data Sheet.

C. *Information.* "I" (information) means that the

inspector does not have an explicit opinion about the information being conveyed in the accompanying comment. There are many reasons why an inspector may not be able to form an opinion about the information being conveyed in a recorded comment. An inspector may not have a access to the necessary manuals or documents to determine whether a person, item, or subject area observed was in compliance with a regulation, a published procedure, or a safe operating practice. The "information" code provides a way to convey different kinds of information and comments to other persons such as POI's who are able to review the comments and form opinions about the information and take action, if appropriate. A typical example of the use of the "I" code is for an inspector to record the last revision date of a manual. The inspector may not be aware of what the last revision date should be but when the information is reviewed by the POI, the POI can determine the status of the operator's manual revision and dissemination system. Another example of the use of the "I" code would be for the inspector to record the type of instrument approach conducted and the minimums used by the PIC. In this example, the POI upon receiving the information can determine whether or not the crew was properly trained for the type of approach and if the PIC used the proper minimums. The primary purpose of this comment section on the PTRS Data Sheet is to effectively convey information to be evaluated for identifying deficiencies as well as both positive and negative trends. Inspectors who are unable to form an opinion about an observation because of the lack of more explicit information, should use the "I" code to classify these types of comments for subsequent evaluation.

D. *Exceeds.* "E" (exceeds) means that, in the inspector's opinion, a person, item, or subject area which was observed or evaluated, exceeded recognized standards or clearly complied with regulations and/or safe operating practices. One of the primary uses of the comment section on the PTRS Data Sheet is to identify trends. Information about positive trend is useful in determining the overall compliance status of an operator. The "E" opinion code is especially useful and should be used to identify positive responses to a previously-taken corrective action. If a particular area of interest has a significant number of associated "E" opinion codes, it can be analyzed to determine the cause of the favorable comments and, if appropriate, substantiate the need to revise programs or procedures in other areas of interest. Inspectors should comment on the positive results of an observation or evaluation as this type of information is valuable feedback on a person's or an operator's performance. An example of the use of the "E" opinion code is the recording of positive comments about the proficiency of crewmembers who have just completed a training curriculum. Such information indicates to the POI that the training provided by the operator is effective.

41. INSPECTOR'S NARRATIVE COMMENT. An inspector's narrative comment of observations and evaluations as recorded in section 4 of the PTRS Data Sheet is the most important part of the overall work activity report. The comment and opinion codes provide for the rapid computer processing of information and for the structured retrieval of information in a format that can be more readily analyzed. The narrative comments, however, are the only means of accurately recording what the inspector has actually observed. The recording of these comments is the final phase of a work activity. For inspection activities, it is a critical phase in the overall scheme of data collection and processing. An inspection report must include factual and meaningful comments or it has little value other than to be a record that an inspection was accomplished. Particular attention should be given to the identification of who or what was observed or evaluated, what specific function was being accomplished, when and where it occurred, and how and why it happened, as appropriate. Recorded comments should be as brief and concise as possible. It is important to keep comments brief to save time on data entry. Inspectors should use abbreviations and contractions when it is known that the contractions will be understood by aviation-oriented personnel. Essential information (such as dates, names of personnel, aircraft make/model/series, registrations numbers, part numbers, and flight numbers) that is recorded in sections 1, 2, or 3 of the PTRS Data Sheet should not be repeated in the comments recorded in section 4 on the form. Inspectors should not, however, exclude essential information to make a comment brief, since there is no limit to the number of words that can be used to record a comment. Comments should fully describe and support the inspector's observations, evaluations, and opinions. Figure 6.1.2.3 includes examples of one method, but not the only method, of recording comments and appropriate comment and opinion codes.

FIGURE 6.1.2.3
EXAMPLES OF COMMENTS

PROGRAM TRACKING AND REPORTING SUBSYSTEM DATA SHEET

SECTION I Record ID: _____

Inspector Name Code: JHF

Activity Number: 1356	FAR: 121	NPG:
Status: (COP) C	Callup Date:	Start Date:
Results: (ACEFISTX) I	Pass/Fail (P/F):	Completion Date: 9/30/89
Designator: ABCA	Airman Cert #: 7283567	
Airman Name: SULLIVAN JOHN L.		
Aircraft Reg #: N 3214AB		
Make-Model-Series: DOUG - 9 - 31		
Point of Departure: LGA	Point of Arrival: IAD	Flight #: 1246

Investigation # (12):
Tracking:
Miscellaneous:
Numeric Misc:
Local Use:
Regional Use:
National Use:
Activity Time:
Travel Time:
Triggers: (Activity #/ INVS/ REXM/ R # (repeat)

SECTION II — PERSONNEL (unlimited)

Personnel Name:	Position:	Base:	Remarks (35 Characters)
CORBET JAMES J.	SIC	LGA	10E FOR SIC

SECTION III — EQUIPMENT (unlimited)

Manufacturer:	Model:	Serial #:	Remarks (23 Characters)

SECTION IV — COMMENTS (unlimited)

PTRS Primary Key	PTRS Com UPIE	Comments (unlimited length)
J727	U	SIC'S LEG. ON LGA 2SID (MAINTAINING CLIMB) WAS FOR SBJ YOR, SIC MARGINALLY EXCEEDED 250 KI
		BTN 7000' AND 8000'. PIC WAS PROGRAMMING FMC WITH
		NEW ATC ROUTING. SIC WAS DISTRACTED BY ATC
		VFR TRAFFIC ADVISORY. NEITHER PILOT CORRECTED
		SPEED UNTIL INFORMED BY INSPECTR. CREW
		DEBRIEFED ON NEED TO MAINTAIN POSITIVE AIRCRAFT
		CONTROL AT ALL TIMES. CONSIDER ITEM CLOSED.
C703	P	IAD ATIS "ZULU" 1855Z TOO FAST. CREW HAD TO
		LISTEN 3 TIMES TO GET ALL INFO. RECOMMEND IAD
		APPROACH CONTROL BE ADVISED.
J103	I	PIC FLIGHT MANUAL REVISION AMENDMENT 22, 9/15/89
J633	P	FLT CLEARED TO CROSS FOR VOR AT 10,000' AND
		250 KT ON DESCENT TO IAD ARPT. SIC DIDN'T START
		DESCENT FROM FL 260 UNTIL ABOUT 5 NM S. OF FIX. FROM
		THIS POSITION SIC COULD NOT HAVE COMPLIED WITH ATC
		RESTRICTIONS. CHECK AIRMAN INTERFERED BY REQUESTING AND
		RECEIVING REVI-CLEARANCE. SIC COMPLETED FLT SATISFACTORY
J103	E	CHECK AIRMAN PROVIDED EFFECTIVE SUPERVISION OF SIC BY LETTING SIC CONDUCT FLT AND BY PROVIDING IMMEDIATE
		WHEN APPROPRIATE FOLLOWED BY A THOROUGH DEBRIEFING

Date: 10/5/89 Originator: JHF District Office: EAIS

Inspector Signature: Supervisor Initials:

43. SUPERVISOR/MANAGEMENT RESPONSIBILITIES. The effectiveness of the PTRS depends on the effective and responsible management of the system. Supervisors and managers must ensure that inspectors understand the system and the significance of providing factual and meaningful comments and opinions. It is important that inspectors be permitted to freely express their comments and opinions. Supervisors and managers must promote and foster a positive working atmosphere to ensure that inspector comments are as objective and accurate as possible. Supervisors and managers are encouraged to carefully review PTRS Data Sheets to ensure the accuracy of PTRS-coded entries and that the narrative comments support inspector opinions, findings, and recommendations. Supervisors and managers may change the PTRS activity "results" code (for example from "S" to "E" or "F"). Supervisors and managers, however, should not change an inspector's opinion code ("U", "P", "I", "E"), or require the inspector to change the opinion code unless the inspector agrees that the entry was entered in error.

44. - 50. RESERVED.

[PAGES 6-28 THROUGH 6-34 RESERVED]